

M E M O R A N D U M

To: Commissioners Clark, Cramer and Wefald
c. PUD, Legal

Fr: Annette Bendish and Jerry Lein

Da: June 27, 2005

Re: Briefing Memo for 6/29 Agenda Item SW-1
PPM Energy, Inc. Wind Farm and Transmission Line Siting Applications
Case Nos. PU-05-47 and PU-05-305

PPM Energy, Inc.(PPM) has filed an application for a Certificate of Site Compatibility for its proposed 150 MW wind farm (PU-05-47) and a consolidated application (PU-05-305) for a waiver of procedures and time schedules, a Certificate of Site Compatibility for a Transmission Facility Corridor (Corridor Certificate) and Route Permit to construct approximately 9.5 miles of 230 kV Transmission line in Pierce County, North Dakota. PPM does not expect to start construction until next year, but requests expedited treatment because orders for turbines are filling fast. The proposed motion would deem the applications complete and issue a Notice of Filing and Notice of Hearing.

When determining whether the transmission line application is complete, the Commission should consider that the application does not include plan and profile engineering drawings or a Class III cultural resource survey.

Plan and Profile Drawings:

Plan and Profile sheets are precise engineering drawings depicting surveyed transmission line and supporting structure locations in relation to surveyed surface data such as elevation, wetland contours, etc. PPM has not yet surveyed its proposed route so no proposed plan and profile drawings are available. PPM explains in its cover letter that it is attempting to avoid repeated surveying and engineering expenses for new drawings should locations change during the siting process. PPM proposes to survey the route after it has been designated and would file the resulting plan and profile drawings at least 14 days prior to holding a preconstruction conference.

PPM did provide aerial photo maps in Figures 17A through 17I of the transmission line application. These maps indicate the proposed route with tower locations that generally parallel structures previously sited by the Commission for the Harvey-Glenboro transmission line in Case No. PU-401-00-200.

Class III Cultural Resource Survey:

The State Historical Preservation Office (SHPO) recommends a Class III cultural resource survey be performed along the proposed route. A Class III survey involves an archeologist walking the route while looking for finds of possible historical significance. PPM proposes to wait until after the route is designated

before performing a Class III survey because it wants to avoid expenses for repeated field work should its proposed route be changed during the siting process. PPM's application does include the results of a Class I file search and PPM would file Class III survey results along with final recommendations from SHPO at least 14 days prior to holding a preconstruction conference.

Recommendation:

In the past, staff has encouraged applicants to file proposed plan and profile sheets with their applications or at least prior to hearing as we believe exact locations are preferable during the siting process. However, plan and profile drawings are not mentioned in the Commission's application guidelines.

In this case we believe that PPM's proposal to provide plan and profile drawings after the route is designated is workable. PPM's aerial photo maps appear to depict route and structure locations precisely enough to evaluate siting criteria and other likely issues. We believe more precise locations can be requested later if needed.

Aside from the plan and profile issue, we have reviewed the application and believe it addresses all items listed in the Commission's application guidelines. We are also comfortable with PPM's intent to perform the Class III cultural resource study after route designation as long as the results and SHPO's clearance to proceed are filed prior to construction.

JRL